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A Professional Corporation

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MICHAEL J. TRAPT

## Served By Fed-Ex Mail

November 7, 2011

Lanny A. Breuer, Esq.  
Assistant Attorney General  
Criminal Division  
United States Department of Justice  
Room 2107  
950 Pennsylvania Ave., NW  
Washington, D.C. 20530-0001

RE: United States v. Tarek Mehanna  
United States District Court for Massachusetts  
Criminal No. 09-10017-GAO

Dear Attorney Breuer,

I represent Tarek Mehanna in the above-referenced case. It is currently on trial. Enclosed please find a subpoena for Special Agent Heidi Williams the Federal Bureau of Investigation, Boston office, to appear and testify at Mr. Mehanna's trial. The trial began on October 24, 2011 and is expected to last through December. I will not know the exact date(s) of her requested testimony until the close of the Government's case-in-chief, although I note that she has attended this trial every day.

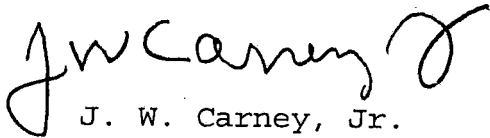
In accordance with 6 C.F.R. § 16.24, I am requesting that Special Agent Williams testify about the investigation in this case and any statements, whether oral or written, that she obtained from witnesses, as detailed in the enclosed affidavit. I am also requesting that she produce any documents within the agency's possession, custody or control regarding these

subjects. These documents include, but are not limited to, any and all FBI "302" reports and any and all handwritten and typed notes.

As grounds for this request, I have enclosed an affidavit.

Please do not hesitate to contact my associate, Kathryn Hayne Barnwell, to discuss these subpoenas.

Sincerely,

A handwritten signature in black ink, appearing to read "JW Carney Jr", with a stylized flourish at the end.

J. W. Carney, Jr.

Enc.

cc: United States Attorney Carmen Ortiz  
United States Attorney's Office  
1 Courthouse Way  
Boston, MA 02210

Assistant United States Attorney Alope Chakravarty  
United States Attorney's Office  
1 Courthouse Way  
Boston, MA 02210

Assistant United States Attorney Jeffrey Auerhahn  
United States Attorney's Office  
1 Courthouse Way  
Suite 9200  
Boston, MA 02210

## UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Tarek Mehanna

*Defendant*

Case No. 09-CR-10017

## SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Special Agent Heidi Williams  
 Federal Bureau of Investigation, Joint Terrorism Task Force  
 One Center Plaza, Suite 1600  
 Boston, MA 02108

**YOU ARE COMMANDED** to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place of Appearance: John Joseph Moakley Courthouse One Courthouse Way Boston, MA	Courtroom No.: 9
	Date and Time: 11/21/2011 9:00 am


You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

Any and all documents related to her investigation in this case and any and all statements, whether written or oral (reduced to writing), of any witnesses she interviewed. These documents include, but are not limited to, and all FBI "302" reports and any and all handwritten and typed notes.

(SEAL)

Date: 11-7-11

CLERK OF COURT



Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (*name of party*) Janice Bassil, Esq  
 20 Park Plaza, Suite 1405, Boston Ma, , who requests this subpoena, are:

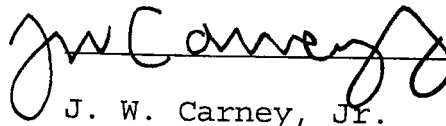
617-338-5566  
 JBassil@CarneyBassil.com

AFFIDAVIT OF COUNSEL  
IN SUPPORT OF DEMAND FOR TESTIMONY  
FROM FEDERAL BUREAU OF INVESTIGATION AGENTS

I, J. W. Carney, Jr., state that the following is true to the best of my information and belief:

1. I am an attorney who represents Tarek Mehanna in United States v. Tarek Mehanna, Criminal No. 09-10017-GAO (United States District Court for Massachusetts). Mr. Mehanna is charged with providing material support to terrorists, conspiracy to provide material support to terrorists, conspiracy to provide material support to a foreign terrorist organization, conspiracy to kill, conspiracy to provide false statements and two counts of false statements.
2. Special Agent Heidi Williams of the Federal Bureau of Investigation and Task Force Officer Thomas Daly did all of the major investigation in this case.
3. Special Agent Williams and Officer Daly interviewed the following key witnesses in this case: Ali Aboubakr, Hassan Masood, Daniel Spaulding, Kareem Abuzhara and Jason Pippin.
4. In December 2006, F.B.I. agents interviewed Mr. Mehanna twice. On November 8, 2008, Mr. Mehanna was arrested and charged with a single count of providing false information to federal agents.
5. Special Agent Williams and Officer Daly will be necessary to testify about inconsistencies that may occur between testimony of the above-listed witnesses and the statements they made to law enforcement, which are reflected in their reports.

Signed on this 7<sup>th</sup> day of November, 2011 under the penalties of perjury.

  
J. W. Carney, Jr.

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case

# UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Tarek Mehanna

Defendant

Case No. 09-CR-10017

## SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Officer Thomas Daly  
Lowell Police Department  
50 Arcand Drive  
Lowell, MA 01852

**YOU ARE COMMANDED** to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place of Appearance: John Joseph Moakley Courthouse One Courthouse Way Boston, MA	Courtroom No.: 9 Date and Time: 11/21/2011 9:00 am
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You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

Any and all documents related to her investigation in this case and any and all statements, whether written or oral (reduced to writing), of any witnesses she interviewed. These documents include, but are not limited to, and and all law enforcement reports and any and all handwritten and typed notes.

(SEAL)

Date:

11-7-11

CLERK OF COURT



Signature of Clerk or Deputy Clerk


The name, address, e-mail, and telephone number of the attorney representing (name of party)  
20 Park Plaza, Suite 1405, Boston Ma, , who requests this subpoena, are:

Janice Bassil, Esq

617-338-5566

JBassil@CarneyBassil.com

A True Copy Attest

  
NOV 14 2011

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Case No. 09-CR-10017

**PROOF OF SERVICE**

This subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: